1 2	William B. Curtis, Esq. (TX SBN 00783918) (admitted pro hac vice)	
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4	17754 Preston Rd., Suite 200 Dallas, Texas 75252	
5	Telephone: (214) 890-1000 Facsimile: (214) 890-1010	
6	Email: bcurtis@curtis-lawgroup.com	
7	IN THE UNITED STATES DISTRICT COURT	
8	FOR THE DISTRICT OF ARIZONA	
9		
10	IN RE: BARD IVC FILTER PRODUCTS MILIABILITY LITIGATION	IDL No. 2:15-MD-02641-PHX-DGC
11		
12	This document relates to the cases listed on Exhibit A attached hereto.	
13		
14	STIPULATION OF DISMISSAL WITH PREJUDICE	
15		
16	COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto ("Plaintiffs") and	
17	Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), file this Stipulation of	
18	Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:	
19	Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby	
20	stipulate to the dismissal of the cases listed on Exhibit A with prejudice to the re-filing of same. Plaintiffs	
21	and Defendants further stipulate that they are to bear their own costs.	
22	WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request	
23	that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same	
24	and order that these parties are to bear their own costs.	
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3	Respectfully submitted this 7 <sup>th</sup> day of April 2021.	
4	respectivity suchinica this , and of right 2021.	
5	Respectfully submitted,	
6	/~/ W:H: D. Ctin	
7	<u>/s/ William B. Curtis</u> William Curtis, Esq.	
8	Texas State Bar No. 00783918  CURTIS LAW GROUP	
9	17754 Preston Rd., Suite 200	
	Dallas, TX 75252 (214) 890-1000 Telephone	
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12	ATTORNEY FOR PLAINTIFF	
13	//p: / /p N /	
14	<u>/s/ Richard B. North</u> Richard B. North, Jr., GA Bar #545599	
15	Nelson Mullins Riley & Scarborogh, LLP	
	2017 17 <sup>th</sup> St. NW, Suite 1700 Atlanta, GA 30363	
16	Tel: 404-322-6000	
17	Fax: 404-322-6050	
18	Richard.north@nelsonmullins.com Attorneys for Defendants	
19		
20	CERTIFICATE OF SERVICE	
21	I hereby certify that on this 7 <sup>th</sup> day of April 2021, I electronically transmitted the attached	
22	document to the Clerk's Office using the CM/ECF System which will automatically send email	
23	notification of such filing to all attorneys of record.	
24		
25	/s/ William Curtis	
	WILLIAM CURTIS	
26		
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